

From: Robert Helfend <rmhelfend@gmail.com>  
Subject: Re: Meet and Confer - Doe v. Dinkfeld  
Date: May 21, 2019 at 5:32:18 PM PDT  
To: Carol Hepburn <carol@hepburnlaw.net>

Carol

Thank you for your email.

Mr. Dinkfeld is considering his options.

ROBERT M. HELFEND  
23838 Pacific Coast Hwy.,  
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Malibu, CA 90265  
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310-739-0062 Cell

On Tue, May 21, 2019 at 3:24 PM Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)>  
wrote:

Robert

I've not heard back from you. We are willing to make this allegation more specific. If I don't hear from you I will put this in letter form.

Carol L. Hepburn  
Carol L. Hepburn, P.S.  
200 First Ave. W. Suite 550  
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On May 15, 2019, at 5:39 PM, John Kawai <[Jk@czrlaw.com](mailto:Jk@czrlaw.com)> wrote:

I would agree that in isolation paragraph 23 could be expanded, but in context of the allegations in the complaint, we can read it in conjunction with paragraphs 9-11, and 12-14.

JOHN A. KAWAI

TRIAL LAWYER

<image001.jpg>

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**From:** Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)>  
**Date:** Wednesday, May 15, 2019 at 4:56 PM  
**To:** rmhelfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)>  
**Cc:** Debbie Bianco <[deb@debbiancolaw.com](mailto:deb@debbiancolaw.com)>, John Kawai <[Jk@czrlaw.com](mailto:Jk@czrlaw.com)>, Michelle Sparks <[michelle@hepburnlaw.net](mailto:michelle@hepburnlaw.net)>  
**Subject:** Re: Meet and Confer - Doe v. Dinkfeld

Robert,

I understand from our brief call just now that you feel that paragraph 23 of the complaint is not specific enough as is required by the USSC Twombly case. I understand that paragraph 23 is the only part of the case that you have this issue with.

We can make the allegation more specific. It seems that could be done via letter, amended complaint, or some other pleading. Do you have a preference?

I also understand from our brief call that you will be defense counsel for this matter going forward given your familiarity with the criminal case. Do you have the materials from the restitution requests made in the criminal case?

Thanks much

Carol

On May 15, 2019, at 4:30 PM, rmhelfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)> wrote:

I'm on my cell.

On May 15, 2019, at 4:30 PM, Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)> wrote:

We need to have everyone on the call. Can you do that?

On May 15, 2019, at 4:22 PM, rmhelfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)> wrote:

I was going to call carol.

I'm ready now, if that works.

On May 15, 2019, at 3:29 PM, Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)> wrote:

What are the conference call arrangements?

CAROL L. HEPBURN

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**From:** John Kawai <[Jk@czrlaw.com](mailto:Jk@czrlaw.com)>  
**Date:** Wednesday, May 15, 2019 at 3:27 PM  
**To:** Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)>  
**Cc:** rmhelfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)>, Debbie Bianco <[deb@debbiancolaw.com](mailto:deb@debbiancolaw.com)>, Michelle Sparks <[michelle@hepburnlaw.net](mailto:michelle@hepburnlaw.net)>  
**Subject:** Re: Meet and Confer - Doe v. Dinkfeld

I'm in a mediation but expect to be done by 4:30.

On May 15, 2019, at 3:18 PM, Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)> wrote:

We would prefer having John included in any meet and confer. I have texted him but have no idea if he is available. Can we reschedule?

On May 15, 2019, at 3:14 PM, rmhelfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)> wrote:

If you are asking whether I have contacted Mr. Kawai, I have not.

On May 15, 2019, at 2:09 PM, Carol Hepburn <[carol@hepburnlaw.net](mailto:carol@hepburnlaw.net)> wrote:

Mr. Helfend

Have you made any effort to include our local counsel Mr. Kawai on this call?

On May 14, 2019, at 2:50 PM, Robert Helfend <[rmhelfend@gmail.com](mailto:rmhelfend@gmail.com)> wrote:

## Counselors

We are reaching out to you to try and arrange a Meet and Confer for tomorrow afternoon.

Pursuant to Local Rule 7-3, Counsel shall meet and confer whenever

opposing Counsel is contemplating a Motion.

Please let us know a convenient time tomorrow, in which to discuss our issues.

Thank you

ROBERT M. HELFEND

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